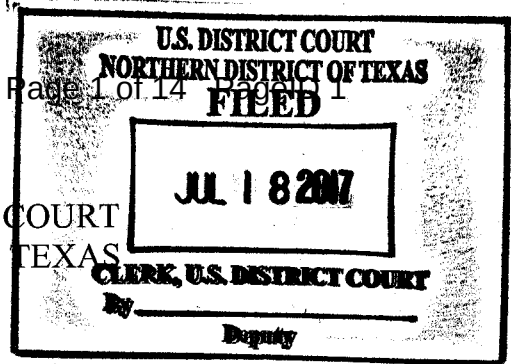


ORIGINAL



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:17-MJ-588

MATTHEW DEAN ADKINS (01)
a/k/a "Karma"
BRANDI LEE BRADDOCK (02)
MICHAEL EVAN BUCHANAN
a/k/a "Tattoo Mike" (03)
SCOTT MATTHEW GOSS (04)
JANIE THOMPSON GRAHAM (05)
BODRICK LITTLE
a/k/a "B-Shot" (06)
MICKEY GORDON MCCLENDON (07)
JAMIE MARCUS PINSON (08)
ONA KATRINA POWERS-SMITH
a/k/a "Katrina Powers"
a/k/a "Trina" (09)
MICHAEL ARTHUR ROBERTSON
a/k/a "Hillbilly" (10)
SCOTT ALLEN YRDANOFF (11)

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2014, and continuing until on or about April 28, 2017, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Matthew Dean Adkins** also known as Karma, **Brandi Lee Braddock**, **Michael Evan Buchanan**, also known as Tattoo Mike, **Scott Matthew Goss**, **Janie Thompson Graham**, **Bodrick Little**, also known as B-Shot, **Mickey Gordon McClendon**, **Jamie Marcus Pinson**, **Ona Katrina Powers-Smith**, also known as Katrina Powers, also known as Trina, **Michael Arthur Robertson**, also known as Hillbilly, **Scott Allen Yrdanoff**, along with others known and unknown, did knowingly

and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 18 years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am currently assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department.

2. I have participated as a law enforcement officer in several investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine, the nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that **Matthew Dean Adkins** also known as Karma, **Brandi Lee Braddock**, **Michael Evan Buchanan**, also known as Tattoo Mike, **Scott Matthew Goss**, **Janie Thompson Graham**, **Bodrick Little**, also known as B-Shot, **Mickey Gordon McClendon**, **Jamie Marcus Pinson**, **Ona Katrina Powers-Smith**, also known as Katrina Powers, also known as Trina, **Michael Arthur Robertson**, also known as Hillbilly,

Scott Allen Yrdanoff, along with Audra Bowden, Sarah Kirkpatrick, Michael Hofman, Phil Ishak, Tiffany Billingsley, Osvaldo Cruz, and Lee Baker, not named as defendants herein, and others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Matthew Dean Adkins** also known as Karma, **Brandi Lee Braddock**, **Michael Evan Buchanan**, also known as Tattoo Mike, **Scott Matthew Goss**, **Janie Thompson Graham**, **Bodrick Little**, also known as B-Shot, **Mickey Gordon McClendon**, **Jamie Marcus Pinson**, **Ona Katrina Powers-Smith**, also known as Katrina Powers, also known as Trina, **Michael Arthur Robertson**, also known as Hillbilly, **Scott Allen Yrdanoff** agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Matthew Dean Adkins** also known as Karma, **Brandi Lee Braddock**, **Michael Evan Buchanan**, also known as Tattoo Mike, **Scott Matthew Goss**, **Janie Thompson Graham**, **Bodrick Little**, also known as B-Shot, **Mickey Gordon McClendon**, **Jamie Marcus Pinson**, **Ona Katrina Powers-Smith**, also known as Katrina Powers, also known as Trina, **Michael Arthur Robertson**, also known as Hillbilly, **Scott Allen Yrdanoff**, along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general, Audra Bowden, Sarah Kirkpatrick, Michael Hofman, Phil Ishak, Tiffany Billingsley, Osvaldo Cruz, Lee Baker, and others distributed or brokered methamphetamine transactions between and among **Matthew Dean Adkins** also known as Karma, **Brandi Lee Braddock**, **Michael Evan Buchanan**, also known as Tattoo Mike, **Scott Matthew Goss**, **Janie Thompson Graham**, **Bodrick Little**, also known as B-Shot, **Mickey Gordon McClendon**, **Jamie Marcus Pinson**, **Ona Katrina Powers-Smith**, also known as Katrina Powers, also known as Trina, **Michael Arthur Robertson**, also known as Hillbilly, **Scott Allen Yrdanoff**, and others.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. On August 25, 2014, Officers with the Arlington Police Department arrested **Michael Evan Buchanan**.
- b. On June 23, 2015, Agents/Officers with the DEA Fort Worth District Office and the Arlington Police Department arrested Tiffany Billingsley.

- c. On November 3, 2015, Officers with the Texas Department of Public Safety arrested **Scott Allen Yrdanoff** in possession of approximately 11 ounces of methamphetamine.

12. Co-conspirator Kandace Stidham identified **Matthew Dean Adkins** as a methamphetamine distributor whom she (Stidham) supplied with large quantities of methamphetamine. Specifically, Stidham stated that on an average of one (1) timer per day, between approximately July and September 2013, she (Stidham) supplied **Adkins** with one (1) pound quantities of methamphetamine. Co-conspirator Sarah Kirkpatrick confirmed that **Matthew Dean Adkins** was involved in distributing methamphetamine. Specifically, Kirkpatrick said that on approximately one (1) occasion she (Kirkpatrick) had observed **Adkins** obtain one (1) kilogram of methamphetamine from Raul Rangel. Co-conspirator, Tiffany Billingsley confirmed that **Matthew Dean Adkins** was involved in distributing methamphetamine. Specifically, Billingsley stated that on at least three (3) occasions, she obtained a quarter ($\frac{1}{4}$) ounce of methamphetamine and on two (2) occasions she obtained a half ($\frac{1}{2}$) ounce of methamphetamine from **Adkins**. Billingsley stated that on at least two (2) occasions she supplied **Adkins** with a half ($\frac{1}{2}$) ounce of methamphetamine and on two (2) additional occasions she supplied **Adkins** with a quarter ($\frac{1}{4}$) ounce of methamphetamine. Additionally, at the time of Billingsley's arrest by Agents/Officers with the DEA and the Arlington Police Department, Agents/Officers seized Billingsley's cell phone.

During the analysis of the information extracted from Billingsley's cell phone, there are multiple messages dated in August 2014, between Billingsley and **Adkins** during which Billingsley and **Adkins** discuss distributing methamphetamine.

13. Co-conspirator Sarah Kirkpatrick identified **Brandi Lee Braddock** as a methamphetamine distributor whom she (Kirkpatrick) had on one (1) occasion observe receive four (4) ounces of methamphetamine, and on two (2) occasions receive one-half ($\frac{1}{2}$) ounce of methamphetamine from Justin Clark. Additionally, **Braddock** stated that she (**Braddock**) had observed Michael Hofman distribute two (2) ounces on two (2) occasions and four (4) ounces on four (4) to five (5) occasions to **Braddock**. Co-conspirator Osvaldo Cruz confirmed that **Brandi Lee Braddock** was involved in distributing methamphetamine. Specifically, Cruz stated that he (Cruz) had witnessed **Braddock** in possession of four (4) ounces of methamphetamine on five (5) occasions and one (1) to two (2) ounces of methamphetamine on ten (10) occasions. Cruz stated that he (Cruz) had witnessed **Braddock** in possession of a one-half ($\frac{1}{2}$) kilogram of methamphetamine on three (3) to four (4) occasions. On October 31, 2015, **Braddock** provided a post Miranda confession to Agents/Officers with the Texas Department of Public Safety where she (**Braddock**) admitted to purchasing and distributing multi ounce quantities of methamphetamine. Specifically, **Broddock** admitted to supplying **Bodrick LITTLE** up to three (3) ounce quantities of methamphetamine.

14. Co-conspirator Sarah Kirkpatrick identified **Michael Evan Buchanan** as a methamphetamine distributor. Kirkpatrick stated that she (Kirkpatrick) had observed Jimmy Quintero and **Buchanan** in possession of two (2) pounds of methamphetamine on at least fifteen (15) occasions and eight (8) ounces of methamphetamine on two (2) occasions. Kirkpatrick stated that she (Kirkpatrick) had obtained a one-half ($\frac{1}{2}$) ounce of methamphetamine from Quintero and **Buchanan** on ten (10) occasions. Co-conspirator Tiffany Billingsley identified **Michael Evan Buchanan** as a methamphetamine distributor whom she (Billingsley) observed receive two (2) ounces of methamphetamine on one (1) occasion from Michael Colby. Additionally, Billingsley stated that on one (1) occasion, she (Billingsley) observed **Buchanan** supply Colby an unknown amount of methamphetamine. Co-conspirator Michael Stepich identified **Michael Evan Buchanan** as a methamphetamine distributor to whom he (Stepich) had delivered four (4) ounces of methamphetamine on approximately one (1) occasion.

15. Co-conspirator Sarah Kirkpatrick identified **Scott Matthew Goss** as a methamphetamine distributor. Specifically, Kirkpatrick stated that Celeste Blair and **Scott Matthew Goss** were methamphetamine distribution partners. Kirkpatrick stated that she (Kirkpatrick) was introduced to Blair and **Scott Matthew Goss** by Lee Baker for the purpose of obtaining methamphetamine from them. Kirkpatrick stated that she had obtained one-sixteenth ($\frac{1}{16}$) ounce of methamphetamine on two (2) occasions from **Scott Matthew Goss**.

Kirkpatrick stated that she had witnessed **Scott Matthew Goss** and Blair in possession of two (2) ounces of methamphetamine on eight (8) occasions and one (1) ounce of methamphetamine on six (6) occasions. Co-Conspirator Lee Baker identified **Scott Matthew Goss** as a methamphetamine distributor to whom he (Lee) had distributed two (2) ounces of methamphetamine on more than fifty (50) occasions and one (1) ounce of methamphetamine on more than one hundred (100) occasions. Baker stated that **Goss** utilized a firearm in connection with his (**Goss's**) methamphetamine distribution.

16. Co-conspirator Osvaldo Cruz identified **Janie Thompson Graham** and **Bodrick Little** as methamphetamine distribution partners. Cruz stated that **Graham** was his methamphetamine source of supply before he met **Little** through **Graham**. Cruz stated that **Little** was the source of supply for the methamphetamine that Cruz obtained from **Graham**. Cruz stated that he met **Graham** in 2015 and that prior to meeting **Little**, he (Cruz) had witnessed **Graham** in possession of one (1) pound of methamphetamine on five (5) to six (6) occasions, four (4) ounces of methamphetamine on twenty (20) to twenty-five (25) occasions, and one (1) to two (2) ounces of methamphetamine on twenty (20) to thirty (30) occasions. Cruz stated that he had assisted **Graham** with her methamphetamine distribution activities by breaking down, weighing, and packaging methamphetamine for distribution. Cruz identified Tiffany Billingsley as a methamphetamine customer of **Graham** to whom he had witnessed **Graham** distribute methamphetamine on several occasions.

Cruz stated that he (Cruz) has known **Little** since 2015. Cruz stated that he (Cruz) had witnessed **Little** in possession of two (2) to three (3) kilograms of methamphetamine on one (1) occasion, one (1) pound of methamphetamine on five (5) to six (6) occasions, and eight (8) ounces of methamphetamine on at least forty (40) occasions. Cruz stated that **Little** frequently carries a .357 revolver. Cruz stated he had witnessed **Little** in possession of a rifle. Co-conspirator Tiffany Billingsley identified **Graham** as the mother of **Matthew Dean Adkins**. Billingsley then confirmed that **Graham** and **Little** were involved in distributing methamphetamine. Billingsley stated that on approximately five (5) occasions, she (Billingsley) obtained one-quarter ($\frac{1}{4}$) ounce of methamphetamine from **Graham**. Billingsley stated that on an additional three (3) occasions, she (Billingsley) supplied one-quarter ($\frac{1}{4}$) ounce of methamphetamine to **Graham**. Billingsley stated that on approximately five (5) occasions she (Billingsley) received one (1) ounce of methamphetamine, on approximately ten (10) occasions she received one-half ($\frac{1}{2}$) ounce of methamphetamine, and on at least twenty (20) occasions she (Billingsley) received one-quarter ($\frac{1}{4}$) ounce of methamphetamine from **Little**. Billingsley stated that the most she (Billingsley) has ever seen **Little** in possession of at one time was three (3) to four (4) ounces of methamphetamine. Additionally, Billingsley stated that on at least fifteen (15) occasions, she (Billingsley) observed **Little** supply an unknown black female customer with one (1) ounce quantities of methamphetamine.

17. Co-conspirator Sarah Kirkpatrick identified **Mickey Gordon McClendon** as a methamphetamine distributor who she (Kirkpatrick) had witnessed obtain ounce and multi ounce quantities of methamphetamine on at least fourteen (14) occasions from Lee Baker. Co-conspirator Lee Baker confirmed that **McClendon** was involved in distributing methamphetamine. Specifically, Baker distributed one (1) ounce of methamphetamine on more than twenty (20) occasions and between $\frac{1}{4}$ ounce and $\frac{1}{2}$ ounce of methamphetamine on more than twenty (20) occasions in 2015 to **McClendon**. Baker stated that **McClendon** also obtained one (1) ounce of methamphetamine on two (2) or three (3) occasions and between a quarter ($\frac{1}{4}$) ounce and a half ($\frac{1}{2}$) ounce of methamphetamine on more than five (5) occasions from Nick Sides in 2015.

18. Co-conspirator Sarah Kirkpatrick identified **Jamie Marcus Pinson** as a methamphetamine distributor. Specifically, Kirkpatrick stated that she (Kirkpatrick) had observed **Pinson** in possession of three (3) to four (4) ounces of methamphetamine on two (2) occasions, two (2) ounces of methamphetamine on two (2) occasions, and one (1) ounce of methamphetamine on five (5) to six (6) occasions. Kirkpatrick stated that she (Kirkpatrick) had obtained an eight ball (3.5 grams) of methamphetamine from **Pinson** on two (2) occasions. Kirkpatrick stated she had distributed $\frac{1}{2}$ ounce of methamphetamine on five (5) occasions to **Pinson**. Kirkpatrick stated she witnessed an unknown male distribute one (1) ounce of methamphetamine to **Pinson** on one (1) occasion. Co-conspirator Tiffany Billingsley confirmed that **Pinson** was involved in distributing methamphetamine.

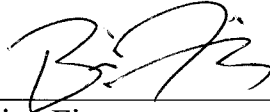
Specifically, Billingsley stated that on one (1) occasion, she (Kirkpatrick) obtained a quarter ($\frac{1}{4}$) ounce of methamphetamine from **Pinson**. Billingsley stated that on one (1) occasion, she (Billingsley) supplied **Pinson** a half ($\frac{1}{2}$) ounce of methamphetamine.

19. Co-conspirator Sarah Kirkpatrick identified **Ona Katrina Powers-Smith** as a methamphetamine distributor who she (Kirkpatrick) had witnessed in possession of eight (8) ounces of methamphetamine on five (5) to six (6) occasions, four (4) ounces of methamphetamine on three (3) to four (4) occasions, and two (2) ounces of methamphetamine on four (4) occasions. Kirkpatrick stated she (Kirkpatrick) and her methamphetamine distribution partner at the time, Drew Justice Windsor, obtained four (4) ounces of methamphetamine from **Powers-Smith** on three occasions and two (2) ounces of methamphetamine each day from **Powers-Smith** for seven (7) months. Co-conspirator Phil Ishak confirmed that **Powers-Smith** was involved in the distribution of methamphetamine. Specifically, Ishak stated he (Ishak) had witnessed Drew Justice Windsor obtain four (4) ounces of methamphetamine on at least four (4) occasions and two (2) to four (4) ounces of methamphetamine on two (2) to three (3) occasions from **Powers-Smith**. Ishak stated that he (Ishak) had obtained two (2) ounces of methamphetamine on one (1) occasion between August 2015 and January 2016, from **Powers-Smith**.

20. Co-conspirator Audra Bowden identified **Michael Arthur Robertson** as a methamphetamine distribution partner of Lori Cross. Bowden stated that from approximately December 2013 and continuing until approximately March 2014, she (Bowden), Cross, and **Robertson** would receive approximately one (1) kilogram of methamphetamine every week, which together, Bowden, Cross, and **Robertson** worked together to distribute. Co-conspirator Doug Faulk confirmed that **Robertson** was involved in distributing methamphetamine. Specifically, Faulk said that for approximately a three (3) week period, on approximately ten (10) occasions, he (Faulk) supplied **Robertson** with between two (2) and four (4) ounce quantities of methamphetamine.

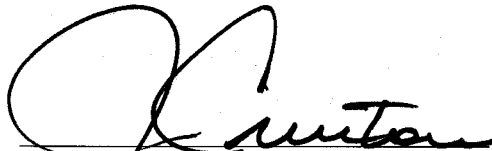
21. Co-conspirator Randy Crisp identified **Scott Allen Yrdanoff** as a methamphetamine distributor whom he (Crisp) had observed with multi kilogram quantities of methamphetamine. Specifically, Crisp stated that in late 2015 or early 2016, he (Crisp) traveled to **Yrdanoff's** residence, located in West Dallas, and observed multiple 5 gallon buckets full of methamphetamine. Additionally, Crisp stated that in 2015, **Yrdanoff** had been arrested with another individual for possessing a large quantity of methamphetamine. Based on Crisp's description of **Yrdanoff's** residence, Affiant successfully located **Yrdanoff's** residence. Additionally, Affiant was able to confirm that **Yrdanoff** had been arrested on or about November 3, 2015, by the Texas Department of Public Safety for being in possession of approximately eleven (11) ounces of methamphetamine.

22. Based on the foregoing, the Complainant believes that probable cause exists that **Matthew Dean Adkins** also known as Karma, **Brandi Lee Braddock**, **Michael Evan Buchanan**, also known as Tattoo Mike, **Scott Matthew Goss**, **Janie Thompson Graham**, **Bodrick Little**, also known as B-Shot, **Mickey Gordon McClendon**, **Jamie Marcus Pinson**, **Ona Katrina Powers-Smith**, also known as Katrina Powers, also known as Trina, **Michael Arthur Robertson**, also known as Hillbilly, **Scott Allen Yrdanoff** along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 9:03⁰⁰ pm, this 18th day of July 2017, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge